

# **EXHIBIT 5**

# **FILED UNDER SEAL**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

Case

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF BENJAMIN INGRAM

WEDNESDAY, AUGUST 16, 2017

Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2678952

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1 Trade Secret 25 items. It has -- 10:52:22

2 (Reporter seeks clarification.)

3 A. -- "Go/V2 Sensor Requirements" in the title. 10:52:33

4 And that's -- that had a list of use cases we expected 10:52:38

5 to drive the design. 10:52:39

6 Q. And, generally speaking, what were the 10:52:42

7 driving use cases? 10:52:46

8 A. It's a hard thing to talk about in general. 10:52:48

9 I think there are 70 or something cases in that 10:52:52

10 document. These are things that, through the years of 10:52:57

11 driving and the millions of miles in driving that 10:53:00

12 we've done, we have come to understand are likely to 10:53:04

13 drive a LiDAR design. 10:53:07

14 Q. And you referred, I think, to the documents 10:53:09

15 that appear in alleged Trade Secret 25 in this case, 10:53:13

16 those documents contain the driving use cases? 10:53:17

17 A. That's correct. 10:53:20

18 Q. We'll look at those later on. 10:53:22

19 Number 3 here says, [REDACTED] [REDACTED]

20 [REDACTED] 10:53:26

21 Do you see that? 10:53:27

22 A. I do. 10:53:28

23 Q. What does that refer to? 10:53:31

24 A. That refers to Christian Lauterbach, who is 10:53:32

25 C. Lauterbach in this e-mail, had built a simulator 10:53:36